

DTR/rr

Firm I.D. No: 90200

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WILBUR DEISHER,

Plaintiff,

vs.

RAPID AMERICAN CORPORATION, et al.

Defendants.

Cause No. 08 cv 2247

Cook County Circuit Court No. 08 L 2548

Judge Kennelly

Magistrate Judge Ashman

In Re: Asbestos Litigation

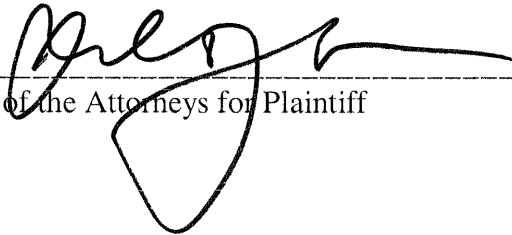
**PLAINTIFF'S MOTION TO REMAND**

NOW COMES the plaintiff, WILBUR DEISHER, by and through his attorneys, COONEY AND CONWAY, and file this Motion to Remand and submit the following facts, to-wit:

1. Defendant, Pfizer, Inc. (hereinafter "Pfizer") filed its Notice Of Removal Of Civil Action on April 21, 2008.
2. Plaintiff's cause of action was originally filed in the Circuit Court of Cook County, Illinois, on March 6, 2008, in cause number 2008 L 002548.
3. Pfizer was served with the Complaint on March 21, 2008.
4. Plaintiff's Complaint alleges exposure to "Asbestos containing products manufactured, distributed and sold by" Pfizer.
5. Pursuant to Stipulation, Plaintiff can represent to this Honorable Court that Pfizer has consented to join his Motion to Remand.

Wherefore, premises considered, Plaintiff prays that the Court grant this Motion for Remand.

Respectfully submitted,

  
-----  
One of the Attorneys for Plaintiff

Daniel T. Ryan  
COONEY AND CONWAY  
120 N. LaSalle St., 30<sup>th</sup> Floor  
Chicago, IL 60602  
(312) 236-6166  
Firm ID #90200

DTR/rr

Firm I.D. No: 90200

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WILBUR DEISHER,

Plaintiff,

vs.

RAPID AMERICAN CORPORATION, et al.

Defendants.

Cause No. 08 cv 2247

Cook County Circuit Court No. 08 L 2548

Judge Kennelly  
Magistrate Judge Ashman

In Re: Asbestos Litigation

**NOTICE OF ROUTINE MOTION**

TO: See Attached Service List


On **May 7, 2008** at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Moran, or any judge sitting in his stead, in the Courtroom usually occupied by him in Room 1843, of the of the United States District Court For The Northern District of Illinois Eastern Division, the following: **Plaintiff's Motion to Remand**, copies of which are attached hereto and herewith served upon you.

  
\_\_\_\_\_  
Cooney and Conway

COONEY AND CONWAY (90200)  
120 N. LaSalle Street, 30th Floor  
Chicago, Illinois 60602  
(312) 236-6166  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned states upon oath that she served a copy of the above and foregoing Notice, together with a copy of the document therein referred to, upon the above-named attorneys by mail and by placing a copy of same in a duly addressed and stamped envelope and depositing same in the U.S. Mail chute located at 120 N. LaSalle Street, Chicago, Illinois on **April 30, 2008**.

  
\_\_\_\_\_  
Renee Rice

[X] Under penalties as provided pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct.